

WALLACE
& NORDAN LLP
ATTORNEYS AT LAW

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FEDERAL ELECTION COMMISSION
2012 AUG -6 PM 12:44
OFFICE OF THE CLERK
JOHN R. WALLACE
RICHARD P. NORDAN
STEPH A. NEWSOME

July 31, 2012

Jeff S. Jordan
Supervisory Attorney
Complaints Examination and Legal Administration
Federal Election Commission
Washington, D.C. 20463

Re: MUR 6599

Dear Mr. Jordan:

We are in receipt of the letter from Scott Laster, Complainant and Executive Director of the North Carolina Republican Party.

I apologize for our delay in response. We had earlier received a similar Complaint and had responded; however, that response was directed to the North Carolina State Board of Elections.

Mr. Laster's Complaint alleges that in the 2012 First Quarter Report filed by the North Carolina Democratic Party, the Party paid funds from its non-federal account to Ms. Krista Anderson of Raleigh, North Carolina. The suggestion is that this payment from a non-federal account was made to a person employed by an entity engaged in federal activities.

Mr. Laster has attached a page from the non-federal report filed with the State Board of Elections, which does indeed identify Ms. Anderson as Operations Director for Organizing for America. Please be advised that Ms. Anderson was employed by the North Carolina Democratic Party in connection with non-federal matters at the beginning of 2012 (and in prior years), and she was paid for those activities from the non-federal account of the party. Thereafter, she became employed in her current position as Operations Director, where she is engaged in federal activities. For all of the duties that she has performed in that position, she has been paid from the federal account of the Party.

Ms. Anderson was identified as Operations Director in the non-federal report to the State Board of Elections referred to by Mr. Laster, because that report was created after her vendor record in the Party's database had been modified to reflect her new capacity. That is, she was Senate Caucus Director at the beginning of the year and had previously been identified on reports of the non-federal account of the Party as such, but in the reporting of the payments made

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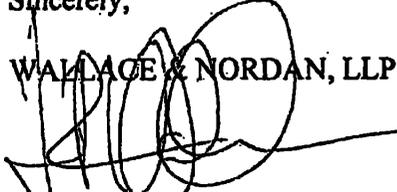
J. Jordan
July 31, 2012
Page 2

in the First Quarter of 2012, the Party used her current identity as a vendor, which identity reflects her current employment as Operations Director. An examination of the federal report of the Party, copies of which is enclosed, demonstrates that Ms. Anderson has been paid from the federal account for her federal role. Please see the attached pages for the Party's federal reports filed on or about the 20th of both March and April.

Please let me know if you have any further questions regarding this matter.

Sincerely,

WALLACE & NORDAN, LLP



John R. Wallace

JRW/coo
Enclosures

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)						PAGE 64 OF 122
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	
	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial) A. Gregory Jackson		Date of Disbursement 02 / 15 / 2012
Mailing Address 4900 Bana Dr. APT. 11 G		Transaction ID : 30b-34-00295-00702
City Raleigh	State NC	Zip Code 27608
Purpose of Disbursement Payroll	Candidate Name	Amount of Each Disbursement this Period 2381.43
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	Category/Type
		(MEMO ITEM)

Full Name (Last, First, Middle Initial) B. Clifford Davy		Date of Disbursement 02 / 15 / 2012
Mailing Address 248 Regimental Drive		Transaction ID : 30b-34-00295-00700
City Cameron	State NC	Zip Code 28326
Purpose of Disbursement Payroll	Candidate Name	Amount of Each Disbursement this Period 1519.58
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	Category/Type
		(MEMO ITEM)

Full Name (Last, First, Middle Initial) C. Krista Anderson		Date of Disbursement 02 / 15 / 2012
Mailing Address 1052 Mills St.		Transaction ID : 30b-34-00295-00715
City Raleigh	State NC	Zip Code 27608
Purpose of Disbursement Payroll	Candidate Name	Amount of Each Disbursement this Period 1529.92
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼
State:	District:	Category/Type
		(MEMO ITEM)

SUBTOTAL of Disbursements This Page (optional).....▶	0.00
TOTAL This Period (last page this line number only).....▶	

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)						PAGE 89 OF 122
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	
	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b	

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NAME OF COMMITTEE (In Full)
North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial) A. Anthony Nagatani		Date of Disbursement 02 / 29 / 2012	
Mailing Address 11771 Texas Ave Apt 2		Transaction ID : 30b-34-00314-00773	
City Los Angeles	State CA	Zip Code 90025	Amount of Each Disbursement this Period 1340.03
Purpose of Disbursement Payroll	Candidate Name		Category/Type
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		[MEMO ITEM]
State: District:			

Full Name (Last, First, Middle Initial) B. Krista Anderson		Date of Disbursement 02 / 29 / 2012	
Mailing Address 1052 Mills St.		Transaction ID : 30b-34-00314-00767	
City Raleigh	State NC	Zip Code 27608	Amount of Each Disbursement this Period 2168.68
Purpose of Disbursement Payroll	Candidate Name		Category/Type
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		[MEMO ITEM]
State: District:			

Full Name (Last, First, Middle Initial) C. Greg Ross		Date of Disbursement 02 / 29 / 2012	
Mailing Address 145 Cherry Lane		Transaction ID : 30b-34-00314-00775	
City Burlington	State VT	Zip Code 05401	Amount of Each Disbursement this Period 1340.03
Purpose of Disbursement Payroll	Candidate Name		Category/Type
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President	Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		[MEMO ITEM]
State: District:			

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)						PAGE 108 OF 201
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	
	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b	

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NAME OF COMMITTEE (In Full)
North Carolina Democratic Party - Federal

A. ADP

Full Name (Last, First, Middle Initial)
Mailing Address PO Box 9001008

City: Louisville State: KY Zip Code: 40290

Purpose of Disbursement: See Memo Entries

Candidate Name: _____

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: _____ District: _____

Date of Disbursement: 03 / 12 / 2012

Transaction ID: 30b-34-00395-0000

Amount of Each Disbursement this Period: 72854.65

Category/Type: _____

B. Krista Anderson

Full Name (Last, First, Middle Initial)
Mailing Address 1052 Mills St.

City: Raleigh State: NC Zip Code: 27608

Purpose of Disbursement: Payroll

Candidate Name: _____

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: _____ District: _____

Date of Disbursement: 03 / 12 / 2012

Transaction ID: 30b-34-00395-00816

Amount of Each Disbursement this Period: 2166.68

Category/Type: _____

[MEMO ITEM]

C. Ellen L Locke

Full Name (Last, First, Middle Initial)
Mailing Address 5309 Tallowtree Drive

City: Raleigh State: NC Zip Code: 27613

Purpose of Disbursement: Payroll

Candidate Name: _____

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: _____ District: _____

Date of Disbursement: 03 / 12 / 2012

Transaction ID: 30b-34-00395-00925

Amount of Each Disbursement this Period: 1111.87

Category/Type: _____

[MEMO ITEM]

SUBTOTAL of Disbursements This Page (optional).....▶	72854.65
TOTAL This Period (last page this line number only).....▶	

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s) for each category of the Detailed Summary Page	FOR LINE NUMBER: (check only one)						PAGE 138 OF 201
	<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26	
	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b	

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NAME OF COMMITTEE (In Full)
North Carolina Democratic Party - Federal

A. Krista Anderson

Full Name (Last, First, Middle Initial)

Mailing Address 1052 Mills St.

City Raleigh State NC Zip Code 27608

Purpose of Disbursement Payroll

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement 03 / 30 / 2012

Transaction ID : 30b-34-00438-01019

Amount of Each Disbursement this Period 2188.68

[MEMO ITEM]

B. Garrison McMurtrey

Full Name (Last, First, Middle Initial)

Mailing Address 346 East Dinkins Street

City Canton State MS Zip Code 39046

Purpose of Disbursement Payroll

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement 03 / 30 / 2012

Transaction ID : 30b-34-00438-01018

Amount of Each Disbursement this Period 1293.43

[MEMO ITEM]

C. Punya Krishnappa

Full Name (Last, First, Middle Initial)

Mailing Address 275 Aberdeen Drive

City Algonquin State IL Zip Code 60102

Purpose of Disbursement Payroll

Candidate Name

Office Sought: House Senate President

Disbursement For: Primary General Other (specify) ▼

State: District:

Date of Disbursement 03 / 30 / 2012

Transaction ID : 30b-34-00438-01017

Amount of Each Disbursement this Period 1340.02

[MEMO ITEM]

SUBTOTAL of Disbursements This Page (optional).....▶ 0.00

TOTAL This Period (last page this line number only).....▶

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